

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 23-CR-20325-RUIZ(s)**

**UNITED STATES OF AMERICA**

**v.**

**WILLIAM MCCAUGHAN JR.,  
a/k/a "WMCCAUGH,"**

**Defendant.**

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**FACTUAL PROFFER**

The United States of America, **WILLIAM MCCAUGHAN JR.** ("Defendant"), and the Defendant's counsel, agree that, had this case gone to trial, the United States would have proven the following facts beyond a reasonable doubt, and that such facts are sufficient to establish the Defendant's guilt as to the offenses in the Superseding Indictment.

On or about December 19, 2022, Defendant, and an adult male, C.L. began chatting using the Kik application. Defendant chatted with C.L. using the username "wmccaugh." On or about January 19, 2023, while Defendant and C.L. chatted, C.L. sent Defendant a video depicting C.L.'s 11-year-old niece fully nude while exiting the shower. C.L. created and captured the video by putting a hidden recorder inside the bathroom used by his niece.

On July 28, 2023, law enforcement executed three federal search warrants authorizing the search of Defendant, his home, and his vehicle. The searches revealed multiple electronic devices, including a cellular device taken from Defendant's person. On that device, agents located the Kik application logged in for use under the "wmccaugh" username. Upon forensically searching the

electronic devices recovered from Defendant's residence, law enforcement discovered chats between Defendant and multiple individuals including 16-year-old boy ("MINOR VICTIM 1") and 14-year-old boy ("MINOR VICTIM 2") discussing sexual acts including discussing sexual acts with pre-pubescent minors with one of the minor victims. MINOR VICTIM 1 turned 17 during the course of his chatting with Defendant.

On March 11, 2021, Defendant, while located in Miami-Dade County, communicated with MINOR VICTIM 2 using Kik, an internet-based messaging application, on his cellular telephone. During their conversation, Defendant asked MINOR VICTIM 2 his age. MINOR VICTIM 2 told Defendant he was 16 years old. During their conversation, Defendant asked MINOR VICTIM 2 to send him images of his genitalia. Defendant states, "let me see more of you," to "spread that ass and let me see the hole I'm going to wreck," and "let's see the rest of your body" and "cock" among other things. In response to Defendant asking for images, MINOR VICTIM 2 sent him multiple media files of his naked penis. The images depicted MINOR VICTIM 2 engaged in sexually explicit conduct and therefore constitute child pornography.

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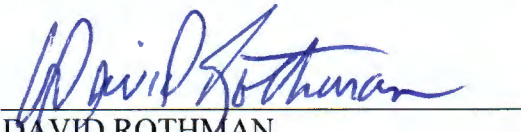
The facts described above are not intended to be a complete recitation of the facts of this case and are merely intended to form a basis for the Defendant's knowing, willful, and intentional plea of guilty.

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

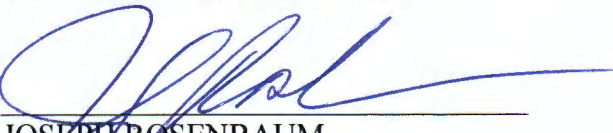
Date: 5/23/24

By:   
ABBIE D. WAXMAN  
ASSISTANT UNITED STATES ATTORNEY

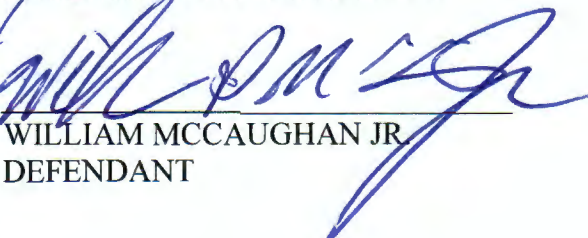
Date: 5/23/24

By:   
DAVID ROTHMAN  
ATTORNEY FOR DEFENDANT

Date: 5/23/24

By:   
JOSEPH ROSENBAUM  
ATTORNEY FOR DEFENDANT

Date: 5/23/24

By:   
WILLIAM MCCAUGHAN JR.  
DEFENDANT